

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
GLOBAL EXPEDITED PACKAGE SERVICES 7
(MC2016-196 AND CP2016-280)
NEGOTIATED SERVICE AGREEMENTS

Docket No.
CP2018-222

**MOTION FOR LATE ACCEPTANCE OF RESPONSE TO ORDER NO. 4624
CONCERNING EFFECTIVE DATE OF A GLOBAL EXPEDITED PACKAGE
SERVICES 7 NEGOTIATED SERVICE AGREEMENT**
(July 11, 2018)

The United States Postal Service (Postal Service) hereby moves for late acceptance of its response to Order No. 4624¹ concerning the effective of the agreement that is the subject of this docket. The response was filed on July 11, 2018, but establishes an effective date of July 1, 2018, for the agreement that is the subject of this docket.²

On May 22, 2018, the Postal Regulatory Commission (Commission) approved Modification Three to the agreement that is the subject of Docket No. CP2017-133, which is with the same customer, stating that:

[t]he Existing Agreement is set to expire May 31, 2018. [Order No. 4576 at 3.] The Modification revises the expiration date to be conditional on when the Commission completes its review of the successor agreement in Docket No. CP2018-222. Notice at 1. If the Commission completes that review by May 31, 2018, the Existing Agreement will expire on May 31, 2018. *Id.* If the Commission does not complete that review by May 31, 2018, the Existing Agreement will expire the earlier of one business day after that review is completed, or June 30, 2018. *Id.* at 1-2.³

¹ PRC Order No. 4624, Order Approving Additional GEPS 7 Negotiated Service Agreement, Docket No. CP2018-222, May 29, 2018.

² United States Postal Service Response to Order No. 4624 concerning Effective Date of a Global Expedited Package Services 7 Negotiated Service Agreement, Docket No. CP2018-222, July 11, 2018.

³ PRC Order No. 4612, Order Approving Modification Three to GEPS 3 Negotiated Service Agreement And Denying As Moot Motion For Temporary Relief, Docket No. CP2017-133, May 22, 2018, at 2-3.

On May 29, 2018, the Commission completed its review of the agreement that is the subject of this docket, stating that, “[t]he Agreement is intended to take effect June 1, 2018.”⁴

For a variety of reasons, including the amount of time between the issuing of Order No. 4624 on May 29, 2018, and June 1, 2018, rate programming processes related to Postal Service-approved PC Postage Providers, and Postal Service internal communications that led to a misunderstanding about the start date, the effective date for the agreement that is the subject of this docket was filed only on July 11, 2018. The Postal Service regrets the delay, but submits that no party has been materially prejudiced by it.

Thus, the Postal Service respectfully moves for late acceptance of the effective date of the agreement that is the subject of this docket in order to maintain continuity of discounted rates to the customer.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno
Chief Counsel
Global Business and Service Development
Corporate and Postal Business Law Section

Christopher C. Meyerson
LaSandy K. Raynor
Attorneys

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1137
(202) 268-8324; Fax -5628
lasandy.k.raynor2@usps.gov
July 11, 2018

⁴ PRC Order No. 4624, Order Approving Additional GEPS 7 Negotiated Service Agreement, Docket No. CP2018-222, May 29, 2018, at 2.